

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CIVIL ACTION NO. 1:24-CV-0046-MOC-WCM**

**GERTRUDE A. SEIGEL,**

**Plaintiff,**

**v.**

**TRAILS CAROLINA, LLC, WILDERNESS  
TRAINING CONSULTING, LLC, AND  
DERRY C. O’KANE,**

**Defendants.**

**DEFENDANTS’ MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO PLAINTIFF’S COMPLAINT**

**NOW COME** Defendants Trails Carolina, LLC and Wilderness Training Consulting, LLC (“Defendants”), by and through counsel, and move the Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.1, for an Order enlarging the time within which Defendants must respond to Plaintiff’s Complaint by an additional nine days. In support of its motion, Defendants show the following:

1. Plaintiff filed a Complaint on February 10, 2024. The Summonses were issued on February 12, 2024.
2. Defendants Trails Carolina, LLC and Wilderness Training Consulting, LLC were allegedly served with the Summonses on February 14, 2024.
3. Defendants respectfully request additional time to investigate and respond to the allegations and claims made by Plaintiff in the Complaint.
4. On March 6, 2024, the undersigned attorneys for Defendants contacted attorneys for Plaintiff by electronic correspondence and via text message requesting a brief extension of time to file the Answer to Plaintiff’s Complaint, which contains very detailed allegations against all Defendants. Attorneys for Plaintiff responded that they did not consent to the courtesy extension

of time to file an Answer. Therefore, attorneys for Defendants now respectfully submit this Motion for a brief extension of time to file Defendants' Answer, up to and including March 15, 2024.

**WHEREFORE**, Defendants respectfully request the Court to grant Defendants an extension of time in which to respond to Plaintiff's Complaint, up to and including March 15, 2024. A proposed Order is attached hereto for the Court's consideration.

**This the 6<sup>th</sup> day of March, 2024.**

**/s/DAVID L. LEVY**

**David L. Levy**

**NC State Bar No. 34060**

**/S/KRISTY M. D'AMBROSIO**

**Kristy M. D'Ambrosio**

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***Attorneys for Defendant Trails Carolina,  
LLC & Wilderness Training Consulting,  
LLC***

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing *Defendants' Motion for Extension of Time to Respond to Plaintiff's Complaint* was served upon all counsel of Record via CM/ECF system.

**This the 6<sup>th</sup> day of March, 2024.**

**/s/DAVID L. LEVY**  
**David L. Levy**  
**NC State Bar No. 34060**